

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OPEN SOCIETY JUSTICE INITIATIVE,

Plaintiff,

v.

19 Civ. 00234 (PAE)

CENTRAL INTELLIGENCE AGENCY,
DEPARTMENT OF DEFENSE, NATIONAL
SECURITY AGENCY and OFFICE OF THE
DIRECTOR OF NATIONAL
INTELLIGENCE,

Defendants.

OPEN SOCIETY JUSTICE INITIATIVE,

Plaintiff,

v.

19 Civ. 01329 (PAE)

DEPARTMENT OF JUSTICE and
DEPARTMENT OF STATE,

Defendants.

NOTICE OF LODGING OF SUPPLEMENTAL CLASSIFIED DECLARATIONS

Defendants the Central Intelligence Agency and Office of the Director of National Intelligence (the “agencies”) hereby provide notice that two supplemental classified declarations, both dated January 5, 2021, have been lodged for the Court’s *in camera, ex parte* review. The agencies respectfully request that the Court grant leave to file these supplemental classified declarations in support of their motion for partial reconsideration of the Court’s December 8, 2020 Opinion and Order (the “Order”), ECF No. 176, pursuant to Local Civil Rule 6.3 and Federal Rules of Civil Procedure 59(e) and 60(b). As set forth in the agencies’ memorandum of law in support of the motion for partial reconsideration, the supplemental classified declarations

have been lodged to enable the Court to make an informed decision on the government's application and because the government is unable to make a public proffer of their contents.

The declarations are classified pursuant to Executive Order 13,526, 75 Fed. Reg. 707 (Jan. 5, 2010), and cannot be disclosed without proper authorization. They have been lodged with a Classified Information Security Officer ("CISO") with the United States Department of Justice's Litigation Security Group. The Court may contact the CISO directly at (202) 514-9016 to assist in securing delivery of the declarations for review at the Court's convenience.

Dated: New York, New York
January 5, 2021

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